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MEMORANDUM

SUBJECT: Groundwater Anomaly at the Steelcote Facility,
St. Louis, Missouri

FROM: Harry Gabbert
Geologist, RCRA/GEOL

TO: Cynthia Hutchison
Project Officer, RCRA/COMP

As requested, I have reviewed the letter dated September 22, 1992, submitted by Shannon & Wilson, Inc., in behalf of Steelcote Manufacturing Company of St. Louis, Missouri. The purpose of the letter is to offer possible explanations for a steep groundwater depression and to propose an evaluation method to be utilized in monitoring wells B and C.

The company proposes to do reverse slug testing of monitoring wells B and C as part of their investigation into the groundwater anomaly associated with these two wells. The reverse slug test will consist of adding nonchlorinated water into the well casing and measuring the rate of permeability. As proposed, this test should give a good indication on whether the suspect wells are occluded or not. I recommend approval for the testing and subsequent redevelopment, should that be indicated from the slug test.

Another item of concern in reviewing related documents on the Steelcote site is a major deviation of the approved groundwater monitoring plan. The original plan called for a screen length of 10 feet. However, the company installed monitoring wells with screen lengths of 45 feet. Other than use as a gross indicator of contaminants within the unconsolidated deposits underlying the site, these wells are inadequate for hydrogeologic characterization or for identifying specific zones of groundwater contamination. Even results of groundwater contaminant analysis may be suspect, due to a dilution factor which may or may not be occurring because of the excessive volume of water being sampled. No explanation for this deviation was given in the documents reviewed; and, in fact, a letter dated May 7, 1992, from Steelcote's attorneys states falsely that all soil borings and wells have been completed as described in the proposal with no

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modifications. This deviation should be explained by the company.

If you have additional comments and/or questions, please contact me at extension 7652.